

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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JU YANG )  
300 Crossing Ridge Ct. )  
Sun Prairie, WI 53590, )  
                        )  
                        Plaintiff, )  
                        )  
v.                      )                      Case No. 18-cv-164  
                        )  
AMERICAN FAMILY MUTUAL )  
INSURANCE COMPANY )  
6000 American Pkwy. )  
Madison, WI 53783, )  
                        )  
                        Defendant. )

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**COMPLAINT**

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**NOW COMES** the above-named Plaintiff, through her attorneys, Jardine Law Office LLC, and does hereby make the following allegations against defendant:

**JURISDICTION**

1. This action asserts claims under federal statutes, including 42 U.S.C. §§ 1981, 1981a, 2000e-2 and 2000e-5, and thus jurisdiction exists pursuant to 28 U.S.C. § 1331.

**VENUE**

2. The claims in this action all arose in Dane County, Wisconsin within the Western District of Wisconsin, so venue is proper in the Western District of Wisconsin, pursuant to 28 U.S.C. § 1331, including subs. (b)(1), (b)(2) and (d).

**ALLEGATIONS/CLAIMS**

3. Plaintiff Ju Yang is an adult resident of the State of Wisconsin, residing at 300 Crossing Ridge Court in Sun Prairie, Wisconsin.

4. Defendant American Family Mutual Insurance Company (“American Family”) is a Wisconsin corporation, often included in what is commonly referred to as “American Family Insurance Group,” with its principal place of business at 6000 American Parkway in Madison, Wisconsin.

5. Defendant is an insurance company selling a wide variety of types of insurance throughout the United States.

6. Defendant has at all times material herein employed more than 500 employees.

7. Plaintiff is a female American citizen of Hmong descent, and Laos is her country of origin.

8. Plaintiff was employee of Defendant at its 302 North Walbridge Avenue (Madison, WI) location from January of 1993 until the date of her involuntary termination on November 16, 2010.

9. At the time of Plaintiff’s termination, she had the job title of “Remittance Processor I.”

10. In the late summer and early fall of 2010, Plaintiff made it known to Defendant that she had initiated divorce proceedings against her now-former husband, who is also of Hmong descent, and whose country of origin is also Laos.

11. As a result of reporting her petition for divorce to Defendant, Defendant terminated Plaintiff's employment, allegedly because of a concern that Plaintiff's Laotian/Hmong husband would commit violence in Defendant's workplace.

12. Plaintiff's husband had neither committed nor had he threatened to commit violence of any sort at Defendant's workplace at any time prior to (or after) Plaintiff's termination.

13. Defendant's decision to terminate Plaintiff's employment was motivated by a discriminatory intent, due to Plaintiff's sex, race and/or national origin.

14. On January 25, 2011, Plaintiff filed a Complaint of discrimination with the City of Madison Equal Opportunities Commission, which was also filed with the United States Equal Employment Opportunities Commission (EEOC).

15. No earlier than Monday, December 11, 2017, Plaintiff received her Friday, December 8, 2017 "right to sue" letter from the U.S. EEOC.

16. Defendant's action was in violation of federal statutes, including 42 U.S.C. §§ 1981, 1981a, and 2000e-2 and 2000e-5.

17. Plaintiff has lost income and continues to lose income by virtue of her improper termination. Plaintiff has also suffered emotional suffering, humiliation and embarrassment because of the discrimination and termination.

18. Defendant's discriminatory action was made with malice or with reckless indifference to Plaintiff's protected rights.

19. Plaintiff seeks punitive damages against defendant for its violation of the aforementioned laws.

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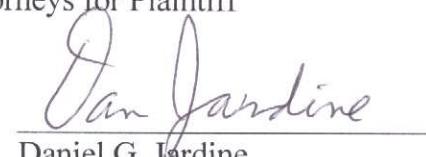
**WHEREFORE**, Plaintiff demands judgment against Defendant for compensatory and punitive damages, together with taxable costs, attorney fees and such other relief as the court deems appropriate.

Dated this 8th day of March, 2018

**JARDINE LAW OFFICE LLC**

Attorneys for Plaintiff

By:



Daniel G. Jardine

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**PLAINTIFF DEMANDS A JURY OF 12 PERSONS**